

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF  
RESPONSES TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1,  
QUESTION 22  
(February 24, 2012)**

The United States Postal Service moves for late acceptance of the filing of its two responses to question 22 of Presiding Officer's Information Request No. 1 (POIR1). An initial, lengthy response to the great detail requested by the question was filed on February 16, 2012; its cover page (at 1) and the response itself (PDF pages 30 and 31) promised that additional information specific to two remaining Excel spreadsheets would be "forthcoming." Today those "forthcoming" responses are also being filed. The delay was occasioned by the bulk and detail of the requested documentation, together with the need to manage other work, much of which relates to the instant docket; an additional source of delay was the need for cross functional coordination and verification of the responses. Completion of this response has been pursued diligently since the December 29, 2011 filing of POIR1. The Postal Service regrets the delay, but believes

that it was unavoidable under the circumstances. Of course, the rule on follow up discovery will apply to supplemental portion filed today, so that any prejudice should be minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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